## TROY LAW, PLLC

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April 14, 2022

Via Ecf

Hon. Paul A. Engelmayer, U.S.D.J. United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: Joint Letter Motion Requesting Extension of Time to Submit Settlement Agreement 1:20-cv-02635-PAE-KHP Abundiz Carranza v. VBFS, Inc. et al

Your Honor,

We represent the Plaintiff in the above referenced matter. We write to respectfully request a further extension of time to submit the parties fully executed Settlement Agreement from April 14, 2022, to May 14, 2022. This is the fourth request made by the parties and granting this request will not prejudice any party.

On January 28, 2022, the parties jointly reported to the Court about the settlement in this matter and requested for four weeks to submit the fully executed settlement agreement for the court's review. Subsequently, this Court extended the parties request to further extend the time to submit the settlement agreement. However, Plaintiffs' Counsel is currently still reviewing the revised edits on the settlement agreement proposed by the Defendants. Additionally, Plaintiff's Counsel is currently scheduled for back to back trials beginning April 20, 2022, through May 20, 2022, in other matters. As such, there would be very little room to work on the settlement agreement in this matter between now and the proposed deadline to submit the settlement agreement.

For the foregoing reasons mentioned above, Plaintiffs respectfully, request to extend the parties time to submit the Settlement Agreement from April 14, 2022, to May 14, 2022.

We thank Your Honor for your time and consideration of this matter and apologize for any inconveniences caused to this Court.

Granted.

SO ORDERED.

Paul A. Grocher

4/15/2022

United States District Judge

Respectfully Submitted, Troy Law, PLLC /s/ John Troy, esq. John Troy

Attorney for Plaintiffs

Cc: all counsel of record via ecf